

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

LANDMARK LEGAL FOUNDATION

Plaintiff,

vs.

**U.S. ENVIRONMENTAL PROTECTION
AGENCY**

Defendant.

Civ. Act. No. 12-1276 (RCL)

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO FILE ITS OPPOSITION
TO PLAINTIFF'S MOTION FOR SPOILIATION SANCTIONS**

Defendant requests an extension of time until August 25, 2014, to file its opposition to Plaintiff's Motion for Spoliation Sanctions, now due on August 11, 2014. Defendant has conferred with counsel for Plaintiff as required by Local Civil Rule 7(m) and they do not oppose this motion. Defendant needs more time for the reasons set forth below.

On July 24, 2014, Plaintiff filed a motion for Spoliation Sanctions attaching thirty-six (36) exhibits along with multiple deposition excerpts, written discovery responses and other attachments. Because of other litigation responsibilities, Counsel for the Defendant requires the extra time to prepare the opposition.

Defendant's preparation of its opposition has been hampered by many other litigation responsibilities, including but not limited to the following: preparing and filing a Reply memorandum in Valerino v. Holder, 14-CV-0089 (TSE/JFA) United States District Court for the Eastern District of Virginia (EDVA) on Monday, July 21, 2014; preparing and filing a Reply

memorandum on Wednesday, July 23, 2014 in Touarsi v. U.S. Department of Justice et al., 13-CV-1105 (RLW); preparation of initial disclosures in Bowe-Connor v. Shinseki, 13-CV-1993 (KBJ); preparing for and attending a Status Conference in Stepney v. Solis, 11-1480 (RWR) on the 24th of July at 10:30 a.m.; preparing for and attending a mediation in Anderson et al., v. Duncan, 06-1565 (RMC) on the 24th of July; preparing for a motions hearing scheduled on July 25, 2014 in EDVA for Valerino; preparing and filing a motion for summary judgment in CREW v. DOJ, Civ. Act. No. 11-374 (CRC), July 28, 2014; preparing Motion to Dismiss in Hinton v. FBI, Civ. Act. No. 13- 0834 (CKK); and preparing for and defending deposition in Landmark v. EPA, Civ. Act. No. 12-1726 (RCL) on August 7, 2014.

Accordingly, the Defendant respectfully requests that the deadline for the Opposition be extended until August 25, 2014.

A proposed Order is attached hereto and incorporated herein.

Respectfully submitted,

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For the District of Columbia

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/s/

By:

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ORDER

Upon full consideration of the Motion, it is ORDERED that:

The Motion for an Extension of time to file Defendant's Opposition is hereby GRANTED. The Parties shall abide by the following schedule:

Defendant's Opposition August 25, 2014

SO ORDERED.

Date: _____

United States District Judge